

EXHIBIT A-1

From: Rita Glavin <rglavin@glavinpllc.com>
Sent: Thursday, June 3, 2021 2:58 PM
To: Lynch, Timothy
Cc: Garbus, Martin
Subject: Fwd: US v. Donziger: Mr. Garbus's 6.3.21 letter

Mr. Lynch,

As managing partner of Offit Kurman, I bring to your attention: (1) the attached letter filed by your colleague Martin Garbus today in U.S. v. Donziger, 19 Cr. 561, S.D.N.Y.; and (2) the below email correspondence with Mr. Garbus.

Respectfully,
Rita Glavin

Rita M. Glavin
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From: Rita Glavin <rglavin@glavinpllc.com>
Sent: Thursday, June 3, 2021 2:51:03 PM
To: Garbus, Martin <mgarbus@offitkurman.com>
Cc: Ron Kuby (ronaldkuby@gmail.com) <ronaldkuby@gmail.com>; rhiyatrivedi@gmail.com <rhiyatrivedi@gmail.com>; Brian Maloney - Seward & Kissel LLP (maloney@sewkis.com) <maloney@sewkis.com>; Sareen Armani <sarmani@glavinpllc.com>
Subject: Re: US v. Donziger: Mr. Garbus's 6.3.21 letter

Mr. Garbus,

You are an officer of the court, and you have an obligation to do due diligence on the accuracy of any assertions you make in court filings. It is not my responsibility to point out the false statements in your submission. I urge you to review your filing, and source every statement that you made.

I intend to submit my email correspondence with you, and your June 3, 2021 letter to the managing partner of your firm.

Respectfully,
Rita Glavin

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From: Garbus, Martin <mgarbus@offitkurman.com>
Sent: Thursday, June 3, 2021 2:36:10 PM
To: Rita Glavin <rglavin@glavinpllc.com>
Subject: Re: US v. Donziger: Mr. Garbus's 6.3.21 letter

Dear Ms Glavin

I apologize for any inaccuracy .

If you will advise me of it, I will correct whatever was wrongly said

Respectfully

Martin Garbus



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On Jun 3, 2021, at 1:59 PM, Rita Glavin <rglavin@glavinpllc.com> wrote:

Mr. Garbus,

Your June 3, 2021 letter filed on the docket (attached) contains inaccurate information and personal attacks. I feel compelled to remind you of Rule 3.3 and Rule 4.1 of the New York Rules of Professional Conduct.

Rule 3.3(a)(1) provides in pertinent part: "A lawyer shall not knowingly . . . make a false statement of fact or law to a tribunal or fail to correct a false statement of material fact or law previously made to the tribunal by the lawyer."

Rule 3.3(f)(2) provides: "In appearing as a lawyer before a tribunal, a lawyer shall not. . . engage in undignified or discourteous conduct."

Rule 4.1 provides: "In the course of representing a client, a lawyer shall not knowingly make a false statement of fact or law to a third person."

Respectfully,
Rita Glavin

Rita M. Glavin

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<ECF 324 (6.3.21 Garbus recusal rqst).pdf>

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